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June 6, 2025

VIA ECF

United States District Court
Southern District of New York
Honorable Henry J. Ricardo
500 Pearl St., Room 21D
New York, NY 10007

Re: Parties' Joint Status Letter

Vekaria v. MThree Corporate Consulting, Ltd. et al.
Case Number: 1:22-cv-03197-JPC-JLC

Hon. Judge Ricardo,

I write on behalf of Plaintiff Jitendra Vekaria ("Vekaria") and Defendant Mthree Corporate Consulting, Ltd. ("Mthree") (Vekaria and Mthree, the "Parties") to provide a joint status letter to the Court, pursuant to the Docket Order at ECF 143. This letter is on consent of the Parties.

The documents governing discovery in this matter are the Case Management Plan ("CPM"), the ESI Protocol, and the Protective Order, including relevant Orders of the Court.

Pursuant to the CPM, the Parties have served and responded to the following demands:

- The parties have each served their initial disclosures;
- The Parties have each served Requests for Production of Documents and responded thereto;
- The Parties have each served Notices to Admit and responded thereto;
- The Parties have each served Interrogatory Demands and responded thereto.
- The Parties have each served deposition notices with dates in July 2025, subject to confirmation of availability of deponents.

The Parties are in the midst of their production pursuant to the aforementioned Requests for Production of Documents, as follows:

- Plaintiff has produced approximately 800 documents in response to Defendant's First Request for Production;
- Defendant is still collecting and reviewing documents in response to Plaintiff's First Request for Production. Defendant intends to complete the first batch of its production by June 30, 2025, with rolling production through that time;
- Defendant is analyzing the work-issued computer that was in Plaintiff's possession and returned to Defendant last month. The Defendant has identified that the work-issued computer is encrypted, and is working on resolving this issue so that it can then image the device's contents and produce any additional responsive documents contained therein, as soon as practicable.

As set forth in the Court's recent Order (ECF 156), the Court extended the time for Plaintiff to file its motion for leave to amend (to July 31, 2025) as Plaintiff is awaiting the above-mentioned production.

The Parties do not have any discovery disputes at this time.

Respectfully submitted,

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By:  _____

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